

EXHIBIT 1

10/20/2022

Gmail - Re: USDC-MA E-filing for Pro se litigants



Chille DeCastro <iamalaskan@gmail.com>

Re: USDC-MA E-filing for Pro se litigants

1 message

Chille DeCastro <iamalaskan@gmail.com>

Mon, Oct 17, 2022 at 2:05 PM

To: Tracy McLaughlin <Tracy_McLaughlin@mad.uscourts.gov>

Thank you, Tracy! You are FAST!

Was the motion to stay the extension of time, which was pleaded in the alternative on the objection, in the judges inbox?

Tracy, I was attacked on the streets last night from a member of their "troll mafia" online group. Its on video.

I know you're busy. Thank you thank you thank you!

Respectfully,
José M DeCastro

Sent from my iPhone

On Oct 17, 2022, at 1:46 PM, Tracy McLaughlin <Tracy_McLaughlin@mad.uscourts.gov> wrote:

Good Afternoon Mr. DeCastro.

The court cannot speak for the Judge.

Thank you,

Clerk McLaughlin

EXHIBIT 2

10/20/2022

Gmail - RE: Kate, this is my Notice of Sanctions per FED rules of Proc.



Delete Lawz <deletelawz@gmail.com>

RE: Kate, this is my Notice of Sanctions per FED rules of Proc.

5 messages

Delete Lawz <deletelawz@gmail.com>

Fri, Oct 14, 2022 at 10:20 PM


To: info@massholereport.com, Delete Lawz <deletelawz@gmail.com>

[Redacted]

Kate,

I'm requesting a call, between you and I, on Monday before 5pm EST. Thus, I need your phone number to confer about the motion I'm filing, or I'll simply assume that you don't oppose it.

Respectfully,
Jose M. DeCastro

 Motion-for-Sactions-for-Spoliation-Rietveld-Wish.pdf
127K

[Redacted]

[Redacted]

[Redacted]

 [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Quoted text hidden]

Wish, Benjamin <bwish@toddweld.com>

Sat, Oct 15, 2022 at 7:23 AM

To: Delete Lawz <deletelawz@gmail.com>

Cc: "info@massholereport.com" <info@massholereport.com>

Mr. DeCastro,

10/20/2022

Gmail - RE: Kate, this is my Notice of Sanctions per FED rules of Proc.

I am happy to confer with you about this motion but unfortunately am not available on Monday.

What is your availability to meet and confer on this coming Wednesday?

Going forward, would you please direct all requests about motion practice, discovery, or other litigation matters to me?

Thank you. Have a good weekend.

Benjamin J. Wish
Todd & Weld LLP
One Federal Street, Boston, MA 02110
T: 617-624-4786
www.ToddWeld.com

On Oct 15, 2022, at 9:13 AM, info@massholereport.com wrote:

----- Original Message -----

Subject: RE: Kate, this is my Notice of Sanctions per FED rules of Proc.

Date: 2022-10-15 01:20

From: Delete Lawz <deletelawz@gmail.com>

To: info@massholereport.com, Delete Lawz <deletelawz@gmail.com>

[Quoted text hidden]


This e-mail, and any attachments thereto, is intended only for the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you have received this e-mail in error, please immediately notify me by return e-mail and

10/20/2022

Gmail - RE: Kate, this is my Notice of Sanctions per FED rules of Proc.

permanently delete the original and any copy of this e-mail message and any printout thereof.

To ensure compliance with requirements imposed by the U.S. Internal Revenue Service, we inform you that any U.S. tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of avoiding U.S. tax penalties.

 Motion-for-Sactions-for-Spoliation-Rietveld-Wish.pdf
127K

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

 [REDACTED] Sactions-for-Spoliation-Rietveld-Wish.pdf
127K

10/20/2022

Gmail - Re: Request for the Production of Documents



Delete Lawz <deletelawz@gmail.com>

Re: Request for the Production of Documents

2 messages

Delete Lawz <deletelawz@gmail.com>

Thu, Oct 6, 2022 at 7:43 PM

To: info@massholereport.com


[REDACTED]

Kate,

Remove all your videos, stop talking about me and we can move to mediation.

Please produce all documents. Due date is 30 days.

Regards,
Jose "Chille" DeCastro

 RFP-kate-peter.pdf
192K

[REDACTED]

[REDACTED]

[REDACTED]

 [REDACTED]

EXHIBIT 3

10/19/2022

Gmail - Cease & Desist; Retract



Delete Lawz <deletelawz@gmail.com>

Cease & Desist; Retract

6 messages

Delete Lawz <deletelawz@gmail.com>
To: info@massholereport.com

Thu, Apr 28, 2022 at 2:50 AM

To the Admin of MHR,

It's been brought to my attention that you reported that I have a criminal record.

You have 24 hours to retract your statement or face a lawsuit for defamation

If you do not retract your statement publicly, I will file a lawsuit against you for Defamation via Slander

Your continued policy and practice, standard of operation, proves a pattern of harassment... And at this point I'm willing to take legal action.

I do not wish to have any contact with you, I do not wish to return correspondence from you, if you continue to harass me publicly...
You will end up in federal District Court

I will check your social media channels for the retraction... If it is not complete and full... You'll be served a lawsuit next week. It won't be in State Court-- it'll be in Federal Court. I won't be suing for money. I'll be suing for Equitable Relief, to have you banned from Social Media by the Federal Judge.
I won't write again. I'll serve you.

Regard,

Chile DeCastro
@ DeleteLawz

Info@massholereport.com <info@massholereport.com>
To: Delete Lawz <deletelawz@gmail.com>

Thu, Apr 28, 2022 at 7:34 AM

10/19/2022

Gmail - Cease & Desist, Retract

Dear Methzilla,

You claim to have a legal team. Unless that is a material falsehood, I'd expect any legal correspondence to come from them.

Speaking of falsehoods, you do have a criminal record, that includes convictions as well as arrests and prosecution. Truth is an absolute defense. You should know that. RAP Sheet is colloquial for "Record of Arrests and Prosecution". I'm sure you knew that, though. Being a legal savant and all. Rlf you'd like to get laughed out of "federal court", be my guest. Considering the communications you had convicted felon Joshua Abrams send me via Facebook, I'm not sure how you anticipate any of this would work out well for you at all, but you can do you, boo-boo. I've seen plenty of your videos now and it is apparent you are not averse to looking stupid (or absolutely batshit insane) in public. That type of confidence would be admirable, were it merited. In your case, it is not merited. You are a weak beta male, rife with obvious painful insecurity that you attempt to mask with false bravado. I see right through it. Jose. Never forget that. I know what's in your record, and the fact that you are so myopically focused on the criminal aspect is fascinating. Your civil records tell a much darker tale. But I think you already know that, Chilito.

I have preserved the message you had Joshua Abrams send me, so let's not talk about "harassment", little man. I didn't reach out to you - you reached out to me. You initiated contact and proudly ensured that contact was rife with threats and vulgar insults. You proceeded last night to defame me by stating the following falsehoods:

- That I was arrested as well as hospitalized for siphoning gas this year. Not only have I not been arrested at all this year, for anything, but I also have never in my life been hospitalized for siphoning gas nor have I ever siphoned gas at all. I'd challenge you to find a record of this supposed arrest anywhere - you can't. Never happened.
- That I have lost 3 of my 4 children due to drug abuse. Also, never happened. I have full custody of two children, and never have had any involvement with any agency due to any drug use.
- That I am currently being sued by multiple individuals. Again., find these supposed lawsuits. They don't exist.

Given the nature of your correspondence to me (demonstrating clear malice) and the substantial material untruthfulness of the aforementioned statements you publicly made with reckless abandon for the truth, I suppose I could demand you cease and desist and retract at the threat of litigation. However, your reputation is so shot and your credibility so nonexistent that it would be ludicrous to believe anything you say could possibly ever have any real bearing on my reputation at all.

In summation, do not ever threaten me, Jose Maria. You are a fucking joke, and I'm not the one. I understand your sad little drug-addled brain tells you that you have the upper hand here, but I can assure you, you don't. I'm smarter than you are, I'm exponentially more hood, and I've seen enough low-level, weak beta con jobs like you in my lifetime that I already have your card pulled, sweet cheeks. Best to just move on. Or don't. I don't back down from a fight, ever.

Regards,

"The Admin of Masshole Report"

Delete Lawz <deletelawz@gmail.com>
To: info@massholereport.com

Thu, Apr 28, 2022 at 9:14 AM

Retract or face legal action

For the 2nd Time. I have no criminal record. U might wanna look up what "criminal record" means. Fool.

Adjust and retract today or face a lawsuit. This is my last correspondence with you.

I want no further contact. Any further contact is harassment. I will exhaust all legal remedies to stop the defamation & harassment.

Likely, You will refuse and Ill simply sue. I represent myself. U won't ever speak to my people.

How do you sleep at night after pPing out your daughter? You're an awful person.

I look fwd to suing you.

Regards
Chille

Sent from my iPhone

On Apr 28, 2022, at 10:34 AM, info@massholereport.com wrote:

info@massholereport.com <info@massholereport.com>
To: Delete Lawz <delelelawz@gmail.com>

Thu, Apr 28, 2022 at 12:33 PM

KATE CONTACTS ME

For the third time, you have criminal charges, some of which resulted in convictions because you plead guilty.

You're actually a bigger idiot than I thought - how is this possible?

Do not invoke my daughter, she too is exponentially tougher than you and eternally more intelligent.

Judging from the anecdotal stories I've heard from people like Tim Lyons and Tina Slay you should probably avoid discussing minors in any capacity, you creep.

It's odd to me how you keep making completely unfounded and defamatory claims about me whilst simultaneously whining about defamation.

Are you mentally handicapped? I want to be sure I'm handling you appropriately. Is there often a lot of juicing in the Special Olympics, or is it just you?

You have no "people", Chillito Sweet Cheeks. It's just you, the legal genius who was laughed at in the courtroom today, admonished by the judge for your lack of basic knowledge of court procedure, and slapped with some additional stay-away orders pending the disposition of your case. Your criminal case is currently open. You know, with the criminal record you "don't have". Did I mention I have people in Innton keeping an eye on you and attending your court dates?

If you don't want correspondence with me, stop corresponding. It's so simple, that I suppose even you could grasp the concept.

I look forward to counter-suing you for your vexatious litigation and defamatory remarks.

Regards,

Not The Bitch You Want To Do This With

[Quoted text hidden]

Delete Lawz <deletelawz@gmail.com>
To: info@massholereport.com

Thu, Apr 28, 2022 at 12:37 PM

I RESPOND

Wrong. We are done. I warned u.

Sent from my iPhone

On Apr 28, 2022, at 3:33 PM, info@massholereport.com wrote:

[Quoted text hidden]

info@massholereport.com <info@massholereport.com>
To: Delete Lawz <deletelawz@gmail.com>

Thu, Apr 28, 2022 at 1:25 PM

***You.**

[Quoted text hidden]

info@massholereport.com <info@massholereport.com> Thu, Apr 28, 2022 at 12:33 PM
To: Delete Lawz <deletelawz@gmail.com>

For the third time, you have criminal charges, some of which resulted in convictions because you plead guilty

You're actually a bigger idiot than I thought - how is this possible?

Do not invoke my daughter, she too is exponentially tougher than you and eternally more intelligent.

Judging from the anecdotal stories I've heard from people like Tim Lyons and Tina Slay you should probably avoid discussing minors in any capacity, you creep

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If you don't want correspondence with me, stop corresponding. It's so simple, that I suppose even you could grasp the concept

I look forward to counter-suing you for your vexatious litigation and defamatory remarks.

Regards,

Not The Bitch You Want To Do This With

[Quoted text hidden]

Delete Lawz <deletelawz@gmail.com>
To: info@massholereport.com

Thu, Apr 28, 2022 at 12:37 PM

Wrong. We are done. I warned u.

Sent from my iPhone

On Apr 28, 2022, at 3:33 PM, info@massholereport.com wrote:

[Quoted text hidden]

info@massholereport.com <info@massholereport.com>
To: Delete Lawz <deletelawz@gmail.com>

Thu, Apr 28, 2022 at 1:25 PM
KATE RESPONDS AGAIN

*You.

[Quoted text hidden]

I Would Like to Pay For Your Legal Expenses

5 messages

info@massholereport.com <info@massholereport.com>

Fri, May 27, 2022 at 9:44 AM

To: Delete Lawz <deletelawz@gmail.com>

Hey there Chille!

Was very sorry to see that you took the "track star" route in regards to your trivial legal issues in Ironton, Ohio. Bobby Law seems legit though, I'd like to pay for him to represent you and really fight against the system instead of the "flight" response you've instinctually taken. Problem is....I'm not sure which law firm to write the check out to?

Also I have some shirts with your face photoshopped onto tekashi 69 for sale that have been selling like hotcakes, and I'd like to give you a free one to wear around, just in case anyone considers engaging in criminal enterprise with you, just as sort of an all encompassing warning, if you will. Cover your bases and all.

Let me know!

Your friend,

The Masshole Report Lady

Delete Lawz <deletelawz@gmail.com>

Fri, May 27, 2022 at 10:04 AM

To: info@massholereport.com

Bcc:

Perfect!

Kate,

This screenshot illustrates your official contact and that information can be procured through a court order.

I do not want any contact with you. I have your phone number and email both established.

Any further contact, directly or indirectly, is harassment.

Kate- Stop contacting me and directing others to contact me. This is legal harassment. You are in big trouble through the legal system.

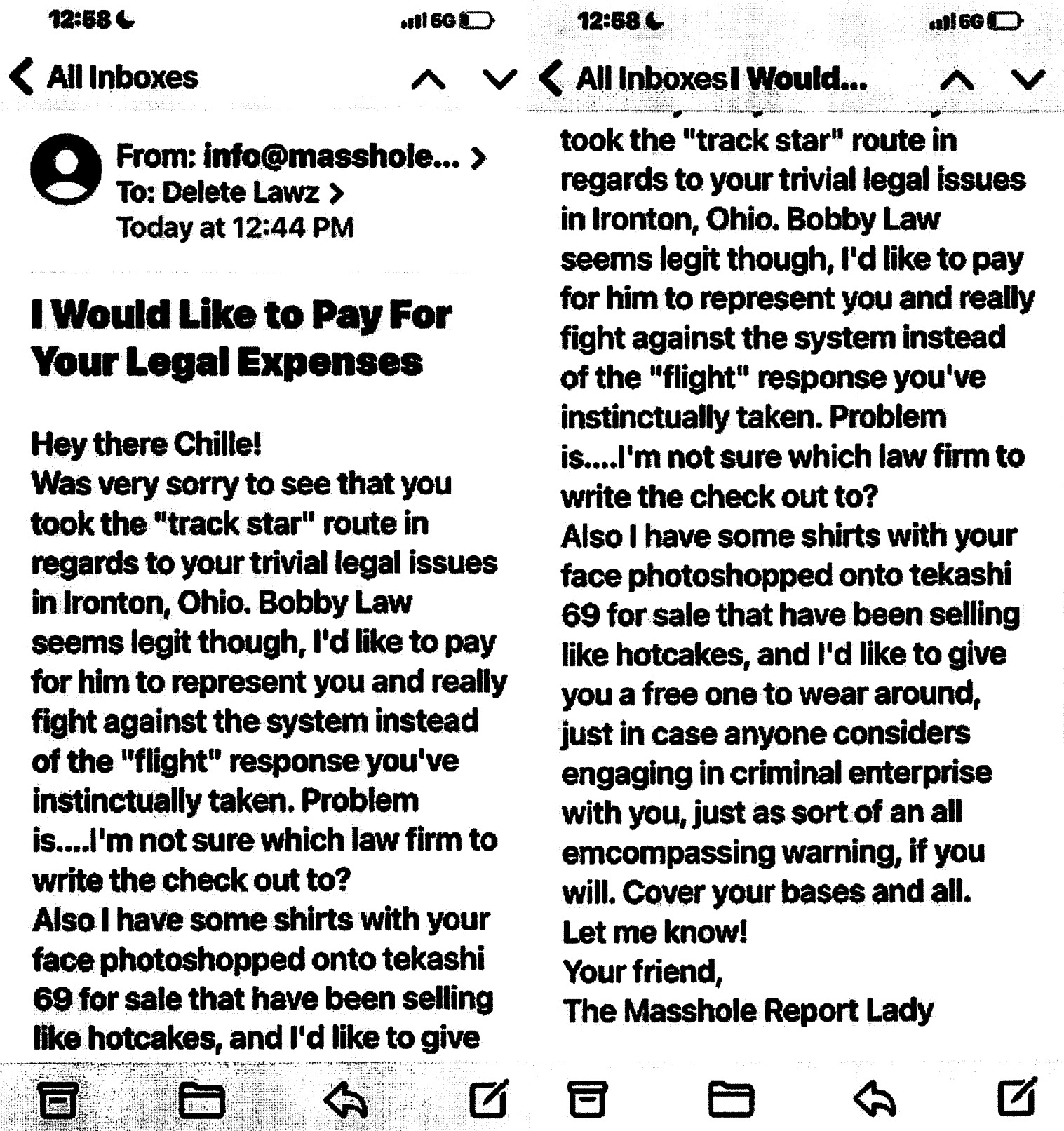
Leave me alone. I am informing you I want want no contact from you in any way, shape or form.

My team is BCC'd on this email. Leave me alone.

I will serve you a lawsuit within two weeks. Leave me alone. I Dont Know you. This is harassment.

Best,

Jose "Chille" DeCastro



ATTACHED SCREENSHOTS – THE T-SHIRT WAS DISPARAGING

10/19/2022

Gmail - I Would Like to Pay For Your Legal Expenses

info@massholereport.com <info@massholereport.com> Fri, May 27, 2022 at 10:36 AM
To: Delete Lawz <deletelawz@gmail.com>

Dearest, Sweet Chillito,

OK, cool. In that case, can I hire Bobby Law to defend me in this very real and serious lawsuit? What law firm would I contact to hire him?

When you say I am in "big trouble"?, how big? Like, have to avoid the state of Ohio indefinitely, big? I want to be prepared. I'd feel a lot more prepared if I had the expert legal services of one "Bobby Law" at my disposal.

All the best, and all my love,

The Lady From Masshole you keep engaging with.

[Quoted text hidden]

[Quoted text hidden]

Sent from my iPhone

On May 27, 2022, at 12:44 PM, info@massholereport.com wrote:

Hey there Chille!

[Quoted text hidden]

info@massholereport.com <info@massholereport.com> Fri, May 27, 2022 at 10:49 AM
To: Delete Lawz <deletelawz@gmail.com>

Also, can you just do me a solid and make it a fact of official record et cetera et al that you will NOT be sending your dad to beat up my dad?

Because when you threaten these baseless and frivolous lawsuits it is entirely the quasi-adult equivalent of a 5 year old threatening to have his dad beat up another 5 year old's dad. And I really love my dad, I don't want anything bad to happen to him.

Contextually I feel like that is what you're threatening and it makes me rather afraid.

Your prompt assurances to my dad's safety would be much appreciated and will probably greatly help your case. Ask Bobby Law about it.

With everlasting adoration,

Kate, on behalf of my dearly loved bloodline

10/19/2022

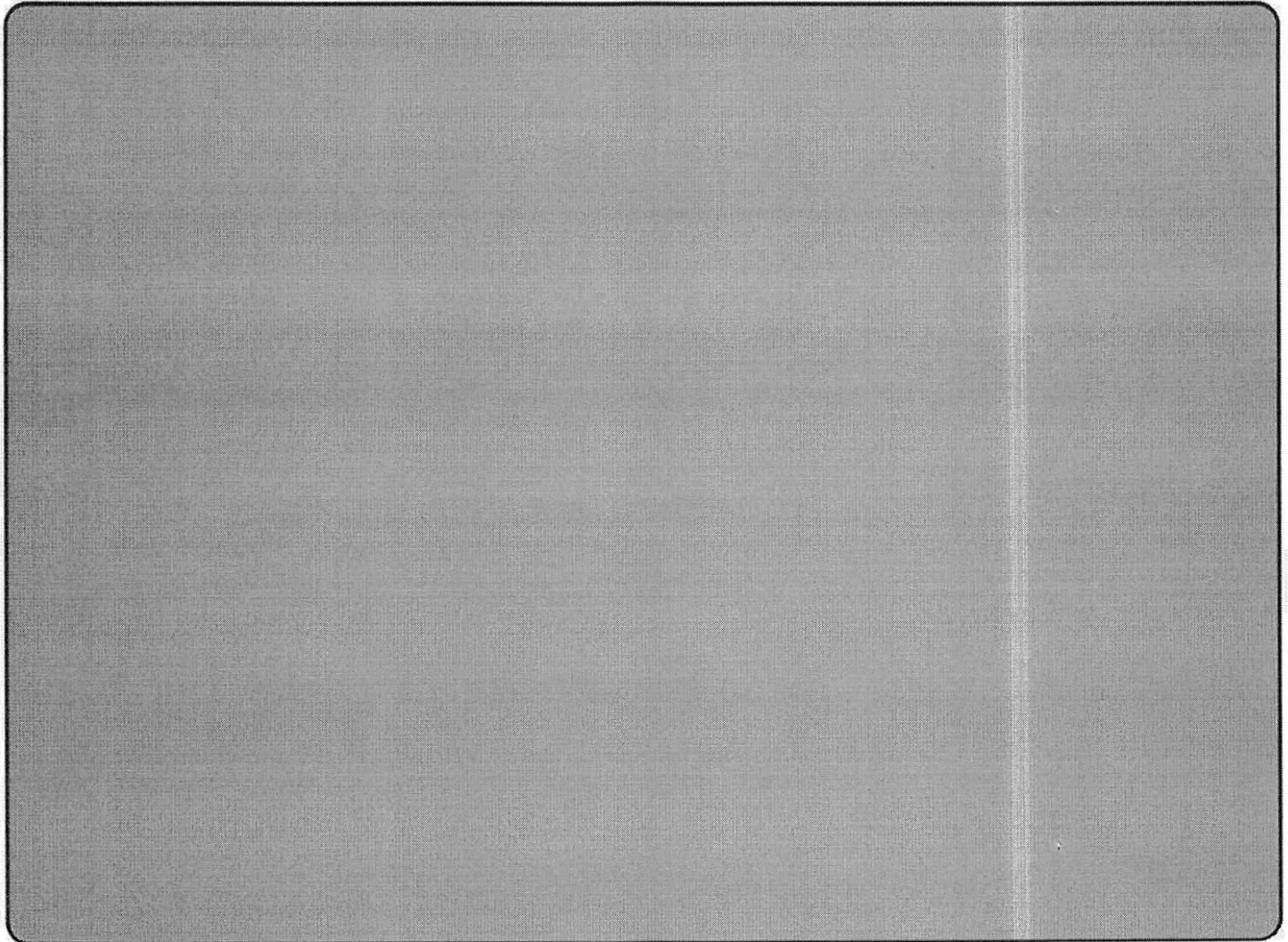
Gmail - I Would Like to Pay For Your Legal Expenses

Sent from my iPhone

On May 27, 2022, at 12:44 PM, info@massholereport.com wrote:

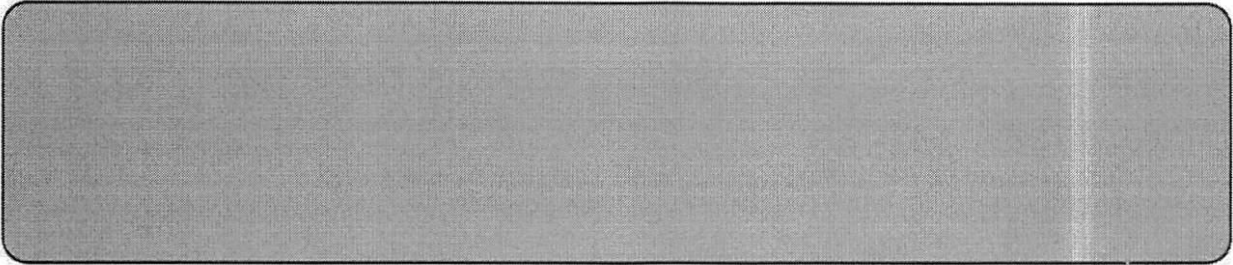
Hey there Chille!

[Quoted text hidden]



10/19/2022

Gmail - I Would Like to Pay For Your Legal Expenses



info@massholereport.com <info@massholereport.com> Sun, May 29, 2022 at 10:16 AM
To: Delete Lawz <deletelawz@gmail.com>

Hi Chille!

I'm waiting on the service of legal documents you promised, however it is a beautiful day outside and I'm getting pretty bored. I have the utmost respect for the law and therefore do no wish to shirk this impending legal service, but I can't sit around all weekend. As your stated intent was simply to inconvenience me, I would give you a 6/10 on delivery thus far.

Off topic, but a lot of people seem to be super concerned about your mental state and well being. I have amassed a good group of your friends who have expressed similar concern, and am organizing a groundbreaking YouTube intervention, because you are a groundbreaking guy. People do care.

With Sincerest Affinity,

Kate



10/19/2022

Gmail - Re: IIED, Lawful Cease and Desist/I DON'T KNOW HOW TO QUIT YOU



Delete Lawz <deletelawz@gmail.com>

Re: IIED, Lawful Cease and Desist/I DON'T KNOW HOW TO QUIT YOU

2 messages

Info@massholereport.com <info@massholereport.com>
 To: deletelawz@gmail.com

Wed, Aug 3, 2022 at 6:37 PM

Hello Mr. DeCastro,

I am the professional, court-recognized troll known as "Masshole Kate." On or about August 2, 2022, I publically came to the realization and revelation that you are a buffoon and clown of such epic proportions that your antics have actually taken siege of my YouTube channel and the constant influx of Chille-related content is driving me insane. In the course of just a few months, you have made a myriad of comically inept threats of lawsuits that are feasibly never going to actually come to fruition, against such a wildly diverse cast of YouTube characters, that it has become increasingly impossible to ignore. You have (possibly?) kidnapped a small elderly dog against his will and now force him to live nearly exclusively in a borderline sentient (self-driving) 2018 Honda Odyssey without water, frequent walks, or proper restraints. You also, inexplicably, force him to "wind sprint". He's not your gym buddy, Chille. He's a terrier. Fuck's sake.

You've crashed audits, been trolled by the entire internet, and exposed yourself as being inherently racist, sexist, and rather homophobic (albeit, probably closeted - I am praying for you. If you want to come out I will totes take you to Pride next year and even buy the body paint).

All this being said, you are taking over my channel and my brain, and I don't know how to quit you. You are the "crack cocaine" of YouTube content - quick, cheap, easy, and extremely damaging. You've also destroyed your fair share of young black men and families - Ask Talib! This "Chille-mania", as it were, is obviously IIED. I am lawfully ordering you to CEASE and DESIST from being such a raging fucking douche, and CEASE and DESIST your clearly made-up satirical comedy character persona. It's too funny. Your humorous depiction of a half-retarded, self-absorbed, narcissistic, washed-up never was is too compelling, and it is causing me damages.

Cease and desist, or you will be added to my FEDERAL TORTS CIVIL RIGHTS LAWSUIT.

Respectfully,

Kate. Always. Wins

BCC: George Soros, PeeWee Herman, Snoop Dogg, Judge Waldo, Mr. Worldwide (Pitbull), et al.

Wed, Aug 3, 2022 at 7:45 PM

10/19/2022

Gmail - Invoice - Please remit at your earliest convenience!



Delete Lawz <deletelawz@gmail.com>

Invoice - Please remit at your earliest convenience!

3 messages

info@massholereport.com <info@massholereport.com> Fri, Sep 23, 2022 at 9:00 AM
To: Delete Lawz <deletelawz@gmail.com>

Good Morning Mr. DeCastro,

Please see attached invoice #001. Your prompt payment is appreciated. Please make all checks payable to "Katherine Peter".

Thank You!

-TM Official Billing Team

 JM Decastro Invoice.pdf
130K

Delete Lawz <deletelawz@gmail.com>

Fri, Sep 23, 2022 at 12:19 PM

Katherine Peter

47 Avery Street, North Attleboro, MA 02760
 info@massholereport.com | www.massholereport.com

Invoice # 001

Date: 9/21/2022

Bill To

Jose Maria "Chille" DeCastro | DBA "Delete Lawz" DBA "Huge YouTube Failure"
 1258 Franklin St # 203, Santa Monica, CA 90404
 (310) 963-2445

For

Cost of time wasted on frivolous court matter

Item Description	Cost
lost wages for Wednesday, September 21, 2022	\$280.00
Bullshit surcharge	\$5.00
travel expenses to Attleboro District Court (fuel, parking)	\$10.00

Subtotal

\$295.00

Tax Rate

Other Costs

Total Cost

\$295.00

Make all checks payable to Katherine Peter

If you have any questions concerning this invoice, use the following contact information:

Troll Mafia Official Administrators- info@massholereport.com

Thank you for your business!

EXHIBIT 4

CHILLE BLAMES HIS BAD KARMA AND GRIFTING DRAMA ON KATE. 😂😂😂



0:02 / 1:56:11

Live Dive: Zane Kane, Keffals V. The Internet At Large

11,151 views Streamed live on Sep 30, 2022 Let's dive into some rabbit holes!
-Zane Kane appears to be a pretty big weirdo, has fringe group connections: ...more

974 Dislike Share Save

Troll Mafia Official
25.1K subscribers

SUBSCRIBE

Comments
333

Remember how Jose's main argument for needing an HPD against Josh is that he's a scary felon?

**"I HOPE YOU BURN IN HELL
AND I HOPE YOUR
KIDS GET BONE
CANCER."**



- JOSE DECASTRO, 2022

0:01 / 2:15:21

Chille DeCastro: Blackmail, Lies, Death Threats And Traffic Tickets

19,411 views Streamed live on Oct 4, 2022 Join this channel to get access to perks:
<https://www.youtube.com/channel/UC4C9...> ...more

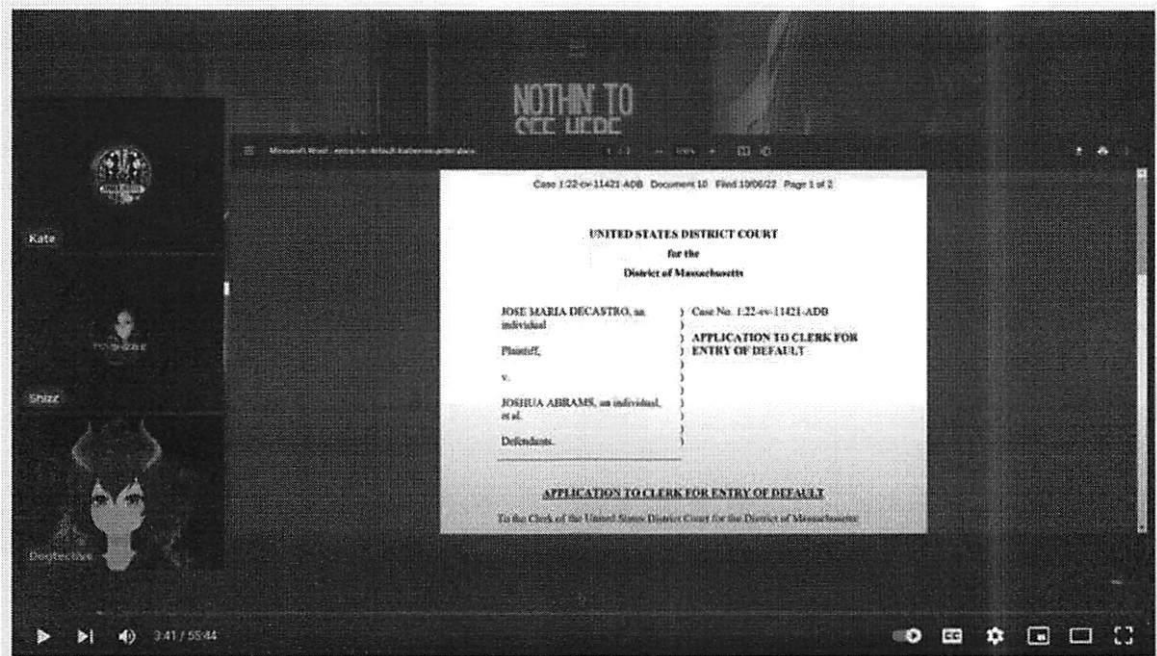
1.4K Dislike Share Save

Troll Mafia Official
26.1K subscribers

SUBSCRIBE

Comments
421

Add a comment...



Case 1:22-cv-11421-ADB Document 10 Filed 10/06/22 Page 1 of 2

UNITED STATES DISTRICT COURT
for the
District of Massachusetts

JOSE MARIA DECASTRO, an
individual
Plaintiff,
v.
JOSHUA ABRAMS, an individual,
et al.
Defendants.

Case No. 1:22-cv-11421-ADB
APPLICATION TO CLERK FOR
ENTRY OF DEFAULT

APPLICATION TO CLERK FOR ENTRY OF DEFAULT
To the Clerk of the United States District Court for the District of Massachusetts:

Has Chille Ever Blackmailed Anyone Before? The Court Docs He Doesn't Want To Get Out!!

13,706 views Streamed live on Oct 6, 2022 Join this channel to get access to perks:
<https://www.youtube.com/channel/UC4C9...> ...more

Troll Mafia Official
26.1K subscribers

JOIN SUBSCRIBE

Comments
278

I can imagine Jose watching this saying "Nope...nope...nope never happened...nope"

TROLL MAFIA
DOVE CAMERON "BREAKFAST"
STREAM STARTING STAY TUNED

00:00:24

TROLL MAFIA OFFICIAL LIVE

2:06 / 1:06:51

Chille Is Sending Me Psychotic Emails, Attacking My Attorney, Threatening Me

13,418 views Streamed live on Oct 11, 2022 If something happens to my mortal body...check with Chille DeCastro first, he probably did it. Your "Constitutional Law Scholar", everyone!...more

Troll Mafia Official
26.1K subscribers

SUBSCRIBE

Comments
463

He's physically terrified of me, team, chad etc. he has his little muscles but he knows he's not tough. That physical terror aside, he's emotionally and mentally PETRIFIED...

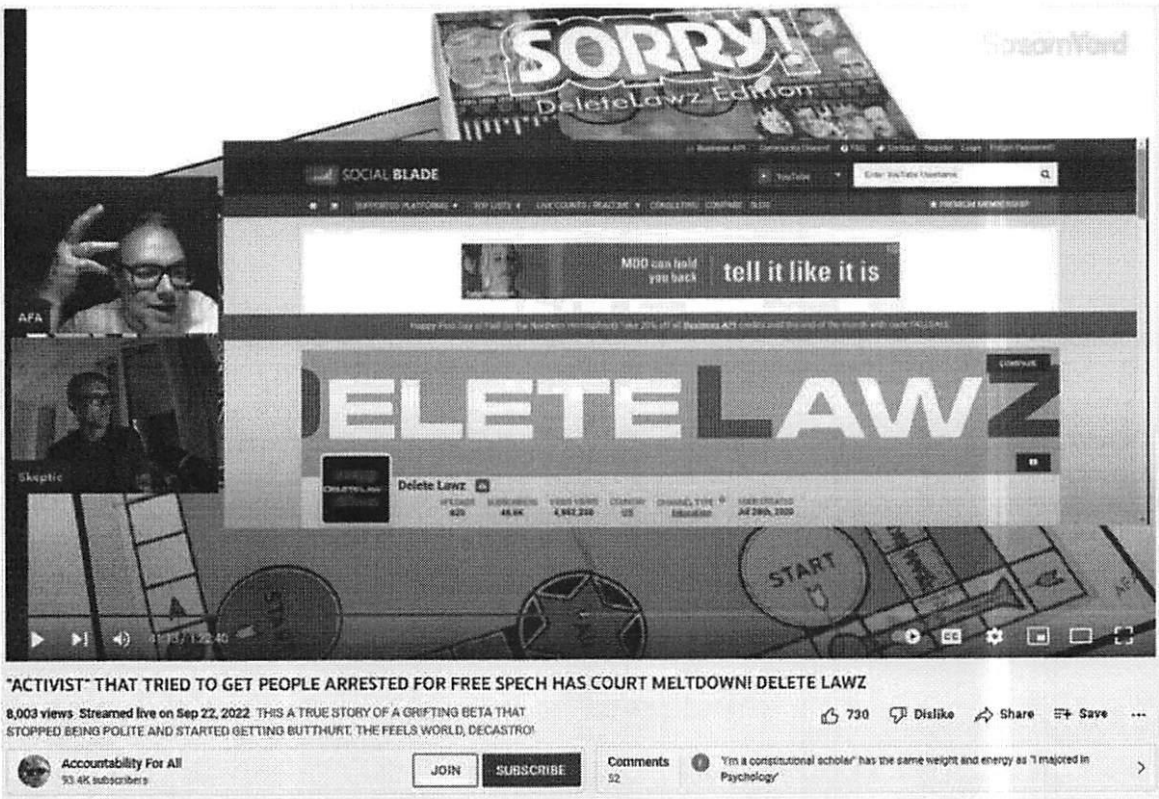


EXHIBIT 5

EXHIBIT 6

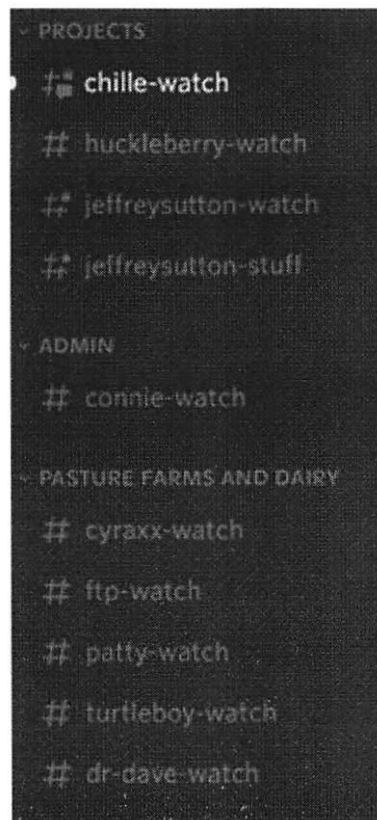


EXHIBIT 7



EXHIBIT 8

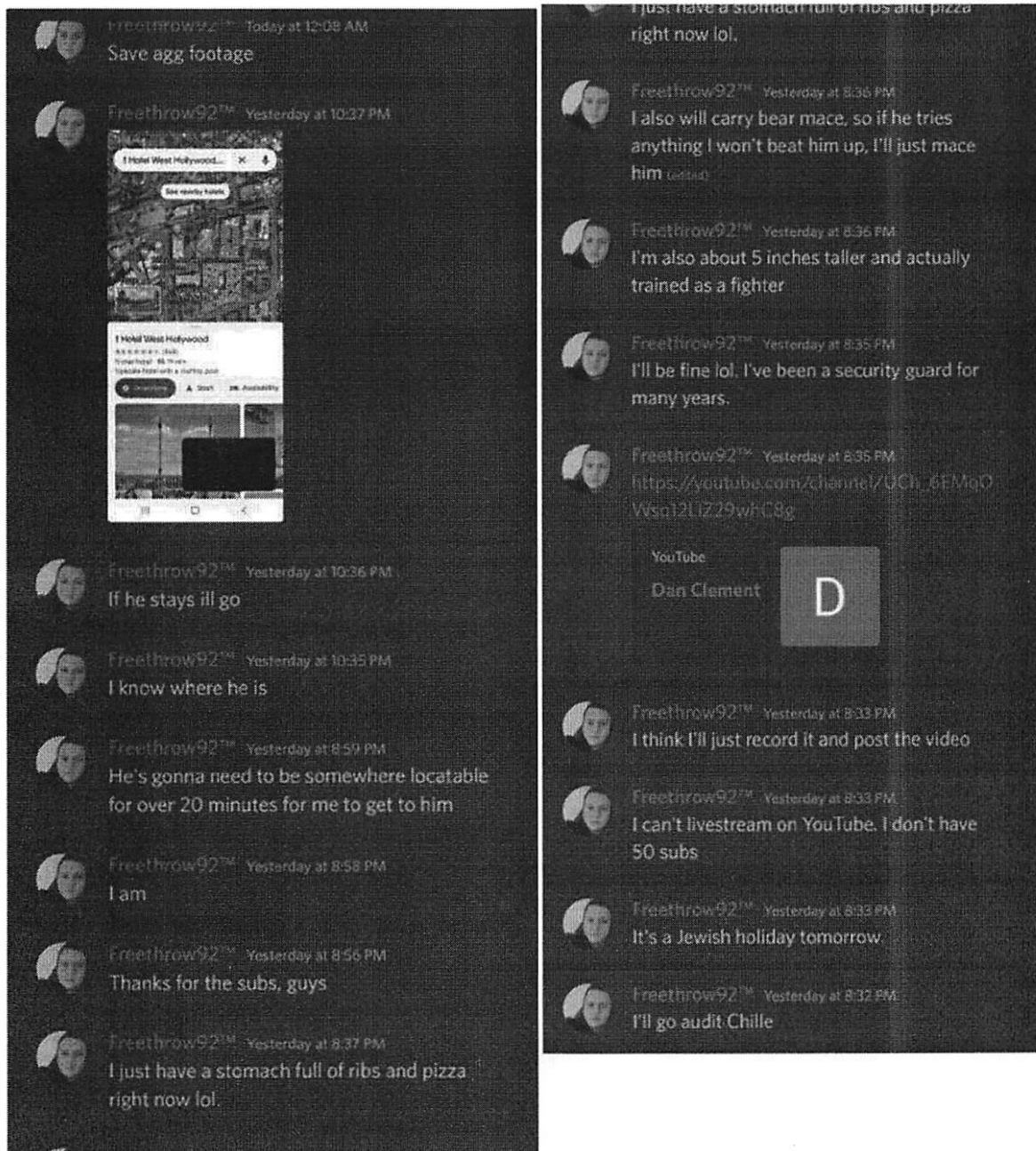


EXHIBIT 9

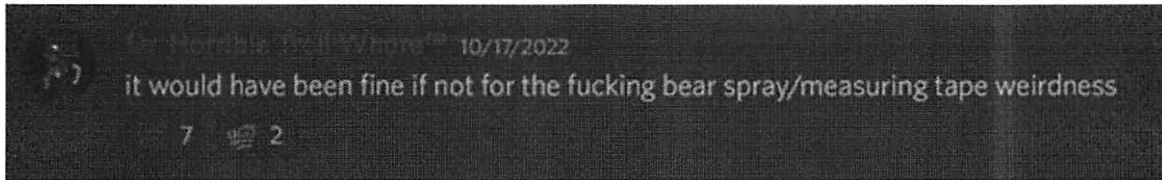


EXHIBIT 10

10/20/2022

Gmail - Todd, please fill this out



Delete Lawz <deletelawz@gmail.com>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

Kristen Lejnieks <KRISTEN.LEJNIEKS@protonmail.com>
To: "deletelawz@gmail.com" <deletelawz@gmail.com>

Sun, Oct 2, 2022 at 9:16 PM

Mr. DeCastro:

My name is Kristen Lejnieks, I am an attorney licensed in 19 states including California, Colorado & Massachusetts, and I look forward to addressing these open issues with you efficiently on behalf of my client. I appreciate you taking a moment to look my questions over.

My goal is to capture and understanding a full & complete picture from you and what you feel you need to be successful in your endeavors from my client. I hope you or your attorney will be able to provide this.

As I understand from the electronic communication history that I reviewed last week actually, you and my client came to an agreement vis text messages, that upon receipt of the information he has provided you - and you acknowledged - that your business dealings had concluded.

Furthermore you have made it clear on several occasions up to, and including last Tuesday, that you would not involve my client in any of your further litigation efforts or expose my client's identity on your various social media ventures.

I would ask that you focus on the last bullet item expeditiously and as a priority, as it does somewhat upset the friendly nature of our discussion. Certainly if this is important enough for you to ask my client to provide you this

10/20/2022

Gmail - Todd, please fill this out

information late on a Sunday, that you - or your attorney- can take some of your own valuable time out and level set everyone's understanding and expectations.

- Please provide the name of your legal counsel and/or who is representing you within the State of California legal system, as this is a State of CA specific form
- Please provide the active case under which this "declaration" would be filed, including Case Name & Case ID, all named parties and their counsel, jurisdiction, and whether you are in the position of Plaintiff or Defendant
- Briefly describe the purpose of said "declaration" in your own words, including your goals and outcomes for said documentation
- Please explain why it is you've returned to my client, presenting this documentation not so much as a request, but as a demand, and why you feel documentation effort this falls within the boundaries of open business between you - Business you previously identified as having been concluded - on more than one occasion.
- Lastly, my client has expressed some concerns about the tone of your text messages, your seeming lack of awareness and concern during the recent death of his sister, and actions you may take with your online media presence.

I am seeking an **immediate written confirmation from you**, Mr. DeCastro, that you *did not*, **and are not**, making any threats of *harrassment*, *online exposure*, or are expressly holding my client to the expectation of **completing this legal documentation under duress**, lest you seek retribution or revenge for any action my client takes that you consider to be less than supportive to you or your case. **Your recent electronic communication does walk a fine line Mr. DeCastro, and it will be comforting to have you confirm we were misinterpreting your intentions.**

As it is after hours on a Sunday and I am off work tomorrow through Wednesday, please reply here at your earliest convenience. I am available tomorrow to support my client with your expedited request.

Warm Regards,

Kristen

KAL/cdj

Kristen A. Lejnieks JD, MBA

Attorney at Law

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